
3C

Action

Educator Preparation Committee

Proposed Revisions to the Accreditation Cost Recovery Fees

Executive Summary: This agenda item brings forward proposed revisions to cost recovery fees for consideration and possible action.

Policy Question: Do the proposed revisions to cost recovery fees align with, and support, the newly updated accreditation system?

Recommended Action: That the Commission adopt the proposed changes to cost recovery fees; review and amend as necessary and direct staff to proceed with the regular rulemaking process.

Presenters: Lynette Roby, Consultant, and Catherine Kearney, Administrator, Professional Services Division

Strategic Plan Goal

II. Program Quality and Accountability

- b) Effectively and efficiently monitor program implementation and outcomes, hold all approved educator preparation programs to high standards and require continuous improvement through the accreditation process.

Proposed Revisions to the Accreditation Cost Recovery Fees

Introduction

This agenda item proposes revisions to the Commission's Cost Recovery fee structure in response to the streamlining and strengthening of the accreditation system.

Background

Cost Recovery Fees

The 2013-14 Budget Act and trailer bill language authorized the Commission to develop and implement a cost recovery plan for the approval of new programs and for activities beyond the normal accreditation activities for ongoing, previously approved institutions/programs. On September 27, 2013, the Commission approved emergency regulations implementing a cost recovery plan for selected accreditation activities including initial institutional approval (IIA), new program proposals (Initial Program Reviews, or IPR), late document submissions, revisits and other specified accreditation activities. Regularly-scheduled accreditation activities are exempt from these fees. On October 23, 2013, the Office of Administrative Law approved the emergency regulations, and the cost recovery regulations and fee schedule were implemented on October 30, 2013. Final approval was received from the Office of Administrative Law on February 5, 2014, thus allowing the Commission to continue assessing the Cost Recovery fees. To read further information about fees, access the [Fees webpage](#) on the Commission website. However, in the past two years the accreditation activities upon which the approved cost recovery fees were based have been updated during the strengthening and streamlining of the accreditation system.

In February 2016, an [agenda item](#) was presented to the Commission for consideration and discussion regarding amending the accreditation fee structure for both Cost Recovery fees and Annual Accreditation fees to better fit the revised accreditation system. Staff reported that it would monitor the fee structures as the transition to the revised accreditation system moved forward and would bring back an item when appropriate. Since the presentation of the February agenda item, the revised accreditation system has begun implementation and this item follows up with proposed changes to the Cost Recovery fee structure. The newly updated accreditation system has not impacted the Annual Accreditation fee structure and no revisions are being proposed.

Proposed Changes to Accreditation Fee Structures

This item is separated into three distinct sections: 1) *Current Cost Recovery Fee Structure* - a description of the current cost recovery fee structure; 2) *Basis for Proposed Revisions* - a discussion of the updates to the accreditation system that are the basis for the proposed revisions to the cost recovery fee structure; and 3) *Proposed Revisions* - the proposed revisions to the cost recovery fees.

Current Cost Recovery Fee Structure

Cost recovery fees require the institution to pay for any additional accreditation activity or activities not part of the regularly-scheduled accreditation activities in which all institutions participate. Examples of activities that generate cost recovery fees include requests for initial institutional approval, review and approval of a new program, submission of a seventh year report required by the Committee on Accreditation, submission of a report addressing stipulations, or a revisit. The institution is charged a fee for the work associated with these extraordinary activities. For Initial Program Review, an institution may elect to provide individuals to serve as readers instead of paying the cost recovery fee and apply the service as in-kind credit. Details about in-kind can be found in the Cost Recovery information on the [Fees webpage](#). In-kind may only be used to offset the Initial Program Review fees. The current cost recovery fee structure is provided below in Table I:

Table I

Accreditation Activity	Cost Recovery Fee
Document Review	
Initial Institutional Approval	\$2,000
Initial Program Review 12 or more standards*	\$2,000
Initial Program Review 6-11 standards*	\$1,500
Initial Program Review fewer than 6 standards*	\$1,000
Biennial Reports and Program Assessment	
Biennial Reports	\$0
Late Submission of Biennial Report	\$500
Program Assessment	\$0
Late Submission of Program Assessment Documentation	\$500 per program
Program Assessment Requiring More than 3 Reviews	\$1,000
Accreditation Site Visits	
Regularly Scheduled Pre-visits	\$0
Regularly Scheduled Site Visits	\$0
Full Program Review during Site Visit as a result of not completing Program Assessment process	\$3,000 per program
Seventh Year Report Addressing Stipulations (no revisit required)	\$500
Additional Reports Required Addressing Stipulations (revisit required)	\$1000
Revisit	\$1,000 per individual attending the revisit
Focused Site Visit when determined as necessary by the COA	\$1,000 per individual attending the focused visit

Basis for the Proposed Revisions to the Cost Recovery Fee Structure

Cost Recovery fees have been collected for the past three years and have funded extraordinary activities above and beyond those regularly scheduled in the 7-year accreditation cycle. However, due to recent revisions and updates to the accreditation cycle, the Cost Recovery fee structure is no longer aligned to activities. Below are examples of some of the changes to the accreditation system that have prompted the proposed revisions be made to the Cost Recovery fee structure:

Prior Accreditation System	Revised Accreditation System
Biennial Report submissions required	Biennial Reports are no longer required during the 7-year accreditation cycle and have been replaced by the submission of annual data reports.
Program Assessment document required for BIR team review. If more than 3 reviews were necessary, extraordinary fee of \$500 was assessed.	Program Assessment documents have been replaced in the new accreditation system by Program Review documents. These will be reviewed one time with an option to submit an addendum at the time of the site visit thus eliminating the \$500 fee for more than 3 reviews.
Initial Institutional Approval required submission of Preconditions and Common Standards and approval by the Commission.	Initial Institutional Approval process has been strengthened and now includes various stages in which documentation is submitted for review and approval by the Commission.

In addition to the changes in the accreditation system listed above, the Cost Recovery fee structure is also being affected by efforts to update and revise program standards. Currently, the cost recovery fee structure is based on the number of standards required for the submission of a new program and any change in the number of standards a program requires may directly affect the calculation of fees. For example, the Preliminary Multiple Subject/Single Subject credential standards were updated December 3, 2015 (see [PSA 15-07](#)) and the number of standards for that program changed from 19 standards to 6 standards. Under the current fee structure for Initial Program Review, (see Table I above) the fee for a Preliminary Multiple Subject or Single Subject program would change from “12 or more standards” at \$2,000 to “6 or more standards” at \$1,500. However, as programs standards are “streamlined” and “strengthened” the number of standards in a program is no longer indicative of the complexity of the effort needed to review the program. As standards are streamlined, they are also strengthened and each standard addresses multiple competencies.

Proposed Revisions

Taking into account the revised accreditation system and updates to program standards and the affect these changes have on Cost Recovery fees, staff is proposing that modifications be made to the fee structure. Below each of the three sections of the current Cost Recovery fee table (Document Review, Program Documentation and Data Reports, and Accreditation Site

Visits) is addressed separately and explanations of the proposed revisions included. Additions and deletions are in track changes.

Document Review

Revisions to this section of Cost Recovery fees address the strengthening of the Initial Institutional Approval process as well as the updates to program standards. It is proposed that because Initial Institutional Approval now requires institutions to go through multiple stages of approval, there be two fees assessed during the process. Currently cost recovery fees are assessed at the beginning of the Initial Institutional Approval process. If, however, an institution submits its eligibility requirements (stage two of the IIA process) and does not receive approval, the institution has paid the full Initial Institutional Approval fee but not finished the entire process and the Commission has no authority to reimburse fees. To account for this possibility, it is proposed that there be a lesser fee assessed at the eligibility requirement stage of the Initial Institutional Approval process and if an institution is approved to move forward, a separate fee be assessed to cover the extraordinary fees associated with the review of the preconditions and common standards.

Revisions to the Initial Program Review fees are proposed to account for updates to program standards. It is proposed that rather than basing the fee calculations for new program proposals on the number of standards, the fees be determined by “categories” of types of programs similar to the manner in which the annual accreditation fees are calculated. For a detailed list of the categories used to calculate Annual Accreditation fees, see Appendix A in this item.

Document Review		
Activity	Fee	Proposed Revision
Initial Institutional Approval – Eligibility Requirements	\$1,000	This fee would be assessed when eligibility requirements are submitted. Institutions may or may not be approved at this point in the process.
Initial Institutional Approval - Following approval of Eligibility Requirements by Commission	\$2,000	Following approval of an institution’s eligibility requirements, an additional fee would be assessed and applied to the submission of other required documents that must be reviewed by Board of Institution members.
Initial Program Review 12 or more standards Category I: Initial educator preparation programs (often known as preliminary programs)	\$2,000	This would become “Category I” and would be comprised of all initial educator preparation programs often known as preliminary programs.
Initial Program Review 6-11 standards* Category II: All 2nd tier programs including induction programs.	\$1,500	This section would become “Category II” and would contain all second tier programs including induction.

Document Review		
Activity	Fee	Proposed Revision
Initial Program Review fewer than 6 standards* <u>Category III: Added Authorization Programs</u>	\$1,000	This section would become Category III and would consist of added authorization programs.
<u>Late Submission of Documentation</u>	<u>\$500</u>	This fee is related to the late submission of any kind of documentation required in the new accreditation cycle.

Program Documentation and Data Reports

Proposed revisions to this section of Cost Recovery fees address the newly updated accreditation cycle in which Biennial Reports and Program Assessment submissions are no longer required.

Biennial Reports and Program Assessment Program Documentation and Data Reports		
Activity	Fee	Proposed Revision
Biennial Reports	\$0	This is deleted because biennial reports have been replaced with annual data reports in the new accreditation cycle.
Late Submission of Biennial Report	\$500	Biennial Reports are no longer a requirement of the accreditation cycle
Program Assessment	\$0	Program Assessment submissions have been replaced with Program Review documents in the new accreditation cycle
Late Submission of Program Assessment Documentation	\$500 per program	Program Assessment is no longer a requirement of the new accreditation cycle.
Program Assessment Requiring More than 3 Reviews	\$1,000	Program Assessment is no longer a requirement of the new accreditation cycle.
<u>Late Submission of Documentation</u>	<u>\$500</u>	This fee is related to the late submission of any kind of documentation required in the new accreditation cycle including data reports.

Accreditation Site Visits

Little revision is needed for Accreditation Site Visit fees. Modifications are proposed to reflect the new accreditation cycle.

Accreditation Site Visits-Cost Recovery		
Activity	Fee	Proposed Revision
Regularly Scheduled Pre-visits	\$0	Remains the same
Regularly Scheduled Site Visits	\$0	Remains the same
Full- Program review of the program during Site Visit as a result of not completing Program Review Assessment process	\$3,000 per program	Program Assessment process is replaced with Program Review to align with the new accreditation cycle
Seventh Year Report Addressing Stipulations (no revisit required)	\$500	Remains the same
Additional Reports Required Addressing Stipulations (revisit required)	\$1000	Remains the same
Revisit- per individual attending the revisit	\$1,000	Remains the same
Focused Site Visit when determined as necessary by the COA (per individual attending the focused visit)	\$1,000	Language is deleted so that “all” focused site visits are reflected including any that the Commission might deem necessary during Initial Institutional Approval.

Staff Recommendation

Staff recommends the following in relation to the proposed revisions to the Cost Recovery fees:

- 1) That the Commission adopt all or some aspects of the proposed revisions to the cost recovery plan;
- 2) Direct staff to proceed with preparing a regulatory file; and
- 3) Direct staff to begin the regular rulemaking process, including the scheduling of a public hearing, to adopt the proposed revisions to the Cost Recovery plan.

Next Steps

If the Commission adopts the revisions to the cost recovery plan, staff will begin the rulemaking process and schedule a public hearing.

Appendix A

Category I Preliminary/Initial Preparation	Category II Second Tier Preparation	Category III Added Authorizations
<ul style="list-style-type: none"> • Multiple Subject • Single Subject • Education Specialist-Mild/Moderate • Education Specialist-Moderate/Severe • Education Specialist-Early Childhood • Education Specialist-Deaf and Hard of Hearing • Education Specialist-Visual Impairments • Education Specialist-Physical and Health Impairments • Education Specialist-Language and Academic Development • Administrative Services • School Psychology • School Counseling • School Social Work • Designated Subjects: Career Technical Education • Designated Subjects: Adult Education • Clinical or Other Rehabilitative-Orientation and Mobility 	<ul style="list-style-type: none"> • General Education Induction • Clear Education Specialist Induction • Administrative Services Induction • California Teachers of English Learners • Bilingual Authorization • Agriculture Specialist • Adapted Physical Education • Early Childhood Specialist • Designated Subjects: Supervision and Coordination • Designated Subjects: Special Subjects • Pupil Personnel Services-Child Welfare and Attendance • Teacher Librarian • School Nurse • Audiology 	<ul style="list-style-type: none"> • Education Specialist Added Authorization-Autism Spectrum Disorder • Education Specialist Added Authorization-Deaf-Blind • Education Specialist Added Authorization-Early Childhood Special Education • Education Specialist Added Authorization-Emotional Disturbance • Education Specialist Added Authorization-Orthopedic Impairments • Education Specialist Added Authorization-Other Health Impairments • Education Specialist Added Authorization-Resource • Education Specialist Added Authorization-Traumatic Brain Injury • Reading and Literacy Added Authorization • Reading and Literacy Leadership Specialist • Mathematics Instructional Added Authorization • Mathematics Instructional Leadership Specialist • Teacher Librarian Special Teaching Authorization • School Nurse Special Teaching Authorization • Speech-Language Pathology Special Teaching Authorization